

Daniel Szalkiewicz
& Associates

23 West 73rd Street
Suite 102
New York, NY 10023

T: (212) 706-1007
F: (646) 849-0033
lawdss.com

September 30, 2024

Via CEF and Email

United States Magistrate Judge Stacey D. Adams
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

***Re: C.V. v. Lauren Carminucci
United States District Court, District of New Jersey
Case No.: 2:24-cv-2096***

Dear Magistrate Adams,

We submit this joint letter pursuant to the court's September 10, 2024 order.

(1) A brief factual summary of the case, including the claims and defenses;

Plaintiff and Defendant were friends for several years. After the relationship ended, Plaintiff alleges that Defendant shared with third parties, without her permission or consent, a private photo showing Plaintiff's exposed breasts and nipples in violation of 15 USC § 6851.

(2) Status of discovery, including any status conferences that are presently scheduled;

On July 15, 2024, Plaintiff served Defendant with her first request for production, request for admission, and interrogatories. On September 30, 2024, Plaintiff received responses and are still reviewing them for completeness.

On August 29, 2024, Plaintiff sent a letter to Defendant with ESI terms and a request for an ESI protocol. On September 30, 2024, Defendant indicated that she would meet and confer to discuss ESI.

(3) Identifying any pending motions;

There are no pending motions.

(4) Informing the Court whether the parties seek a settlement conference.

The parties attempted to resolve the matter pre-litigation but were unable to settle the matter.

Respectfully submitted,

Daniel S. Szalkiewicz, Esq.

By: Daniel S. Szalkiewicz, Esq.